

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE
AT CONCORD**

In Re:)	Case No. 25-10233
)	
)	Chapter 13
Brian J. Goodman, Sr,)	
Debtor)	
)	February 11, 2026

**SHELLPOINT MORTGAGE SERVICINGS OBJECTION TO DEBTOR'S MOTION TO
APPROVE BUY-OUT**

NOW Comes Shellpoint Mortgage Servicing as Servicer for JP Morgan Chase Bank, National Association and hereby object to the Debtor's Motion to Approve Buy-Out as follows:

1. Creditor is the holder of a mortgage encumbering the property located at 33-35 Pinecrest Circle, Concord, NH 03301.
2. The Debtor signed a promissory note and mortgage to which the Creditor is the holder thereof pursuant to the Proof of Claim filed at Claim No. 12 and the pending Motion for Relief at ECF No. 172.
3. Just prior to filing this bankruptcy petition, the Debtor transferred his ownership in the property to Fosterville Properties LLC to which Deed is recorded in the Merrimack County Registry of Deeds in Book 3884, page 2104 on March 21, 2025.
4. The Debtor filed a Chapter 13 Plan on or about January 16, 2025 which contemplated a sale/buyout of the Debtor's membership in a LLC.
5. The Debtors Motion at ECF No.184 provides no information as to a sale price and that the Creditor's Lien will be paid in full.
6. While the Debtor did file a Notice at ECF No. 174 of a proposed buyout or refinance, it is still lacking in information nor was it noticed for hearing.
7. At the hearing on the Creditor's Motion for Relief, this honorable Court encouraged the Debtor to supplement his Motion to include more information if it was in fact a motion to sell the property, although it has already been deeded.
8. The Creditor's Objection is currently scheduled for today and hereby objects to any sale as the information is lacking as to any sale price, if the Creditor's lien will be paid in full and any other pertinent information as to the sale.
9. Moreover, the Debtor most likely lacks any authority to sell the property as he deeded the property to Fosterville Properties and it most likely is no longer property of the Estate.

By: /s/ **Jennifer L. Joubert**

Jennifer L. Joubert, Esq. | BBO #671032

Barton Gilman LLP

One Liberty Square, 4th Floor

Boston, MA 02109

(617) 654-8200 (telephone)

(617) 482-5350 (fax)

jjoubert@bglaw.com (e-mail)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE
AT CONCORD**

)	Case No. 25-10233
In Re:)	
)	Chapter 13
Brian J. Goodman, Sr,)	
Debtor)	
)	February 11, 2026

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Bankruptcy Court for the District of Massachusetts using the CM/ECF System, which will send electronic notification of such filing, in accordance with Rules 7004(a), 9014 F.R. Bankr. P. a copy as follows:

Office of the U.S. Trustee: USTPRegion01.MR.ECF@usdoj.gov

Andrew M. Dudley, Bankruptcy Trustee: jawill@chap13.com

I further hereby certify that on February 11, 2026, I mailed via first class mail, postage prepaid, a copy of the foregoing document to the following:

DEBTOR
Brian J. Goodman, Sr., Pro-Se
40 Hall Street
Concord, NH 03301

Fosterville Properties LLC
c/o Dana Crowe
40 Hall Street
Concord, NH 03301

Dana Crowe
56 E. Side Road
Northfield, NH 03276

By: /s/ **Jennifer L. Joubert**
Jennifer L. Joubert, Esq. | BBO #671032
Barton Gilman LLP
One Liberty Square, 4th Floor
Boston, MA 02109
(617) 654-8200 (telephone)
(617) 482-5350 (fax)
jjoubert@bglaw.com (e-mail)